

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Gregory Terrell Foreman

Write the full name of each plaintiff.

CV

(Include case number if one has been assigned)

-against-

Experian

Faxifax

**COMPLAINT**

Do you want a jury trial?

Yes     No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

**Federal Question**

**Diversity of Citizenship**

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

15 U.S.C. 6802 - respect of sharing personal information

15 USC 1681 section 602 A - Right to privacy

15 USC 1681 604 A section - consumer can't furnish without my instructions

15 U.S. code 1666 b - creditor may not treat a payment late under open-end consumer plan

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Equifax,  
(Plaintiff's name) is a citizen of the State of

Georgia  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, Experian, Equifax, is a citizen of the State of  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, Experian, is incorporated under the laws of <sup>Equifax</sup> <sub>Georgia</sub>  
the State of Texas  
and has its principal place of business in the State of Texas/California  
or is incorporated under the laws of (foreign state) \_\_\_\_\_  
and has its principal place of business in \_\_\_\_\_.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Gregory T Foreman  
First Name Middle Initial Last Name

100 E Mosholu Parkway S Bronx, NY 10458  
Street Address

Bronx NY 10458  
County, City State Zip Code

33-600-6088 foremangreg46@gmail.com  
Telephone Number Email Address (if available)

## B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

<u>Experian</u>		
First Name	Last Name	
<u>Credit Reporting Agency</u>		
Current Job Title (or other identifying information)		
<u>PO Box 4500</u>		
Current Work Address (or other address where defendant may be served)		
<u>Allen</u>	<u>TX</u>	<u>75013</u>
County, City	State	Zip Code

Defendant 2:

<u>EQUifax</u>		
First Name	Last Name	
<u>Credit Reporting Agency</u>		
Current Job Title (or other identifying information)		
<u>PO Box 740241</u>		
Current Work Address (or other address where defendant may be served)		
<u>Atlanta</u>	<u>GA</u>	<u>30374</u>
County, City	State	Zip Code

Defendant 3:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

Defendant 4:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

**III. STATEMENT OF CLAIM**Place(s) of occurrence: Credit Reporting ElectronicallyDate(s) of occurrence: July 7, 2023, September 3, 2023**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Experian has reported inaccurate information for years.  
The company is very hesitant to remove information  
that is either not mine or wrongly reported. Federal  
law ~~states~~ (US code 1666b) states that a credit reporting  
agency should NOT treat a payment under an open-end  
consumer credit plan as late for any purpose. Furthermore,  
US code 6802 states that non-public information should  
not be shared to any parties or third parties. If I am  
not mistaken late payments, account balances and  
transactional experience~~is~~ between the consumer and agency.  
Consumer reporting agencies are supposed to give consumers  
an "opt out" option as required by Federal Law (USC 6802)  
and they never do so. IS USC 1681 section 602 A also states  
I have a right to privacy. These laws have been

Violated over and over and something needs to be done about it.

Equifax have reported inaccurate accounts on my credit file. They have also lied about removing 2 inquiries from my credit file. Those inquiries are have a confirmation number of 3282560850. The agent said it was due to technical issues that the inquiries was not removed. It has been about 7 months and those items still remain on my report.

#### INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Impacted credit scores, credit denials, defamation of character, stress

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.

\$3,000 in damages. Removal of inaccurate information from credit profile. Accounts with inaccuracies include T+D/citibank, Lending Point LLC, Elan Financial, Capital One, First Premier Bankcard. Many laws were violated and these items need to be removed immediately. We can immediately settle this case if all item are removed.

## V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

11-29-2023

Dated

Gregory Foreman

Plaintiff's Signature

Gregory

T

Foreman

First Name

Middle Initial

Last Name

190 E Mosholu Parkway S

Street Address

Bronx

NY

10458

County, City

State

Zip Code

313-6000-6088

Telephone Number

foremangreg46@gmail.com

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes  No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

U.S. Courthouse Annex  
195 E Wenzel Rd  
Bronx, NY 14589-5151

USM  
SDNY

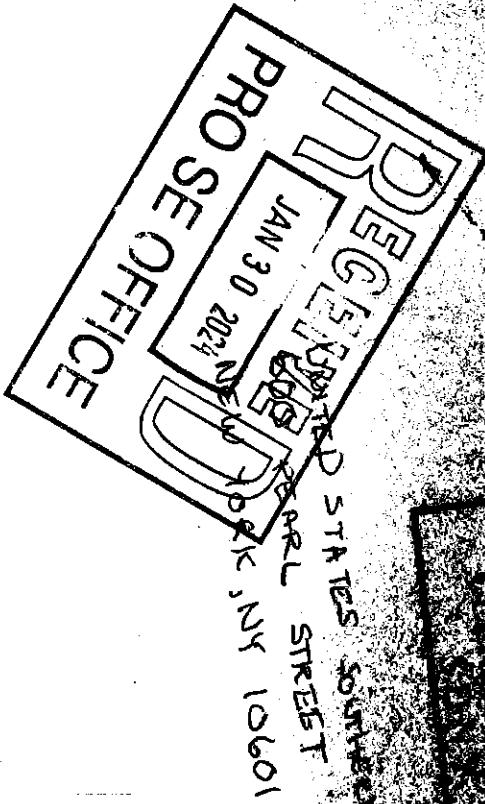
(420) 10007



NEW YORK NY 10007-1316  
500 PEARL ST

TO:  
SHIP

USPS FIRST-CLASS MAIL



RECEIVED  
U.S. COURTHOUSE ANNEX  
NEW YORK

PMB  
1/29/24

RDC  
1/29/24